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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,) Case No. 3:12-cr-00112-LRH-VPC
11)
12 Plaintiff,) **Order Granting Second Stipulation to**
13) **Extend Time for Government's**
14 vs.) **Response to Defendant's Motion for**
15) **Order Reducing Sentence or Modifying**
16 MATTHIAS HADDOCK,) **Judgment**
17)
18 Defendant.)
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26 IT IS HEREBY STIPULATED AND AGREED, by and between Assistant United
27 States Attorney Robert L. Ellman, counsel for the United States of America; and Assistant
28 Federal Public Defender Joy Chen, counsel for Matthias Haddock, that the government's
29 response to Mr. Haddock's Motion for Order Reducing Sentence or Modifying Judgment
30 (ECF No. 74) be extended to and including February 27, 2023.

31 This stipulation is entered into for the following reasons:

32 1. Mr. Haddock filed his supplemental motion on December 29, 2022. ECF
33 No. 74.
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2. The government's response is currently due on January 27, 2023. ECF No. 78.

3. Undersigned counsel is the newly-appointed chief of the appellate division at the U.S. Attorney's Office for the District of Nevada. In addition to handling criminal appeals, the appellate division is responsible for litigating some of the compassionate release motions, including the motion filed in this case.

4. With the former appellate chief's departure on December 16, 2022, the appellate division is down one full-time AUSA (from five to four). This circumstance has increased the workload of the remaining appellate AUSAs.

5. Undersigned counsel has assigned the responsibility for this matter to himself, based on the temporarily heightened workloads of appellate division AUSAs. Government counsel believes he will need additional time, to and including February 27, 2023, to adequately review the motion, receive additional documents from BOP, and prepare the government's response.

6. Undersigned counsel assures the Court that he has been diligent and does not seek this extension for purposes of delay.

7. Mr. Haddock's counsel consents to this extension of time. This is the government's second request for an extension of time to file its response in this matter.

DATED this 19th day of January, 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By: s/ Joy Chen
JOY CHEN
Assistant Federal Public Defender
Counsel for Matthias Haddock

By: s/ Robert L. Ellman
ROBERT L. ELLMAN
Assistant United States Attorney
Counsel for the United States

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,) Case No.: 3:12-cr-00112-LRH-VPC
5 Plaintiff,)
6 vs.)
7 MATTHIAS HADDOCK,) **ORDER**
8 Defendant.)
9

10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the government's response to Defendant's
12 Motion for Order Reducing Sentence or Modifying Judgment (ECF No. 74) be due on
13 February 27, 2023.

14 IT IS SO ORDERED.

15 DATED this 20th of January, 2023.

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18 LARRY R. HICKS
19 UNITED STATES DISTRICT JUDGE
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